

2. On or about April 23, 2016. and at all times relevant herein, on information and belief, the defendant The City of New York was and is a domestic corporation lawfully organized and existing under the laws of the State of New York, and on said date and at all times relevant herein, said defendant had and has a principal place of business located at 530 Municipal Building, New York, New York 10007.

3. On or about April 23 2016,, and at all times relevant herein, on information and belief, defendants “John Doe” and “Richard Roe”, are NYPD police officers, whose true names are presently unascertained, and each act of wrongdoing herein after alleged to have been committed by said defendants was committed within the scope of their agency and/or authority and/or employment and/or a municipality implemented policy, statement, ordinance, regulation and/or decision officially adopted by that body’s officers, resulting in the herein after stated constitutional violations, on behalf of defendant The City of New York, which expressly and/or impliedly ratified each act of wrongdoing herein after alleged to have been committed by defendants “John Doe” and “Richard Roe”, and at all times relevant herein, said individual defendants acted pursuant to a defendant municipality implemented custom, policy, regulation, ordinance and/or decision to arrest and/or prosecute African-American males who allegedly committed alcohol-related crimes in public, such as the Plaintiff allegedly herein.

4. Pursuant to 28 U.S.C. Section 1343(a)(3), the Federal Court herein has original jurisdiction to redress the deprivation of civil rights under color of any State law, statute, ordinance of any right privilege, or immunity secured by the U.S. Constitution, providing for equal rights of citizens or of all persons within U.S. jurisdiction, and jurisdiction exists herein.